

EXHIBIT 165

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

The County of Summit, Ohio, et al. v.
Purdue Pharma L.P., et al.,
Case No. 18-op-45090

The County of Cuyahoga, Ohio, et al. v.
Purdue Pharma L.P., et al.,
Case No. 17-op-45004

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

DECLARATION OF SONYA KWON

1. I am a Senior Managing Director at Ankura Consulting Group. I lead the Complex Data and Statistical Analysis practice and specialize in the application of financial, statistical, and complex data-intensive analyses to legal and regulatory issues.
2. I have submitted an expert report on behalf of CVS Indiana, L.L.C. and CVS Rx Services, Inc. in this case and have been deposed by plaintiffs. My report sets forth analyses of ARCOS and CVS shipment data pertinent to CVS Indiana and CVS Rx Services. My qualifications, processes, and evaluation of the pertinent data sets are contained in my report.
3. For purposes of this declaration, I have analyzed the ARCOS and CVS shipment data to determine when CVS Rx Services, Inc. made its first shipment of a hydrocodone combination product to a CVS pharmacy in Cuyahoga County or Summit County.
4. The ARCOS data shows that CVS Rx Services made its first shipment of a hydrocodone combination product to a CVS pharmacy in Cuyahoga County or Summit County on April 14, 2014. The CVS shipment data confirms that CVS Rx Services made no shipments of hydrocodone combination products to a CVS pharmacy in Cuyahoga County or Summit County before April 14, 2014.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 25th day of July, 2019.

A handwritten signature in blue ink, appearing to read "Sonya Kwon", written over a horizontal line.

Sonya Kwon